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September 5, 2024

Hon. Mary Kay Vyskocil  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl St.  
New York, NY 10007-1312

**Via Electronic Filing**

Re: Style Stitch, Inc. v. The Avyan Group, LLC 1:23-cv-10701-MKV

Dear Judge Vyskocil:

This firm represents The Avyan Group, LLC, defendant in the above captioned matter. I write to oppose the Plaintiff's request for a thirty day extension for the time to file their amended complaint. Plaintiff has had ample time to review its own records to locate information related to the jurisdictional basis for its complaint, and only yesterday indicated that it would need additional time. Notably, the Plaintiff has not served any discovery demands on the Defendant relating to this issue, despite having almost a month pass since the decision was made on the motion to dismiss. Furthermore, the Plaintiff has had many months to provide all information in its possession to counsel to properly set forth allegations in the complaint regarding jurisdiction. Plaintiff should not be rewarded for its lack of diligence in this matter with another extension.

As we have previously noted, there are functional courts in the State of New Jersey and the District of New Jersey where this matter can be heard without any question of personal jurisdiction.

Very truly yours,

Avram E. Frisch

Cc: Plaintiff